

### Remarks

#### Status of the Claims

Claims 1-2, 5-6, 11-32, 35-36, and 41-61 are pending in the application. All claims stand rejected. By this paper, claims 1 and 2 have been amended merely to include limitations already cited in claim . For the reasons set forth below, Applicant submits that each of the pending claims is patentably distinct from the cited prior art and therefore reconsideration of the claims is respectfully requested.

#### Claim Rejections

Claims 1-2, 6, 11, 14, 15, 16, 17, 31, 32, 36, 41, 44-47, and 61 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,637,028 issued to Voyticky et al. ("Voyticky") in view of U.S. Patent No. 5,809,471 issued to Brodsky ("Brodsky"). Claims 5, 21-29, 35, and 51-59 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Voyticky and Brodsky, in further view of U.S. Patent No. 5,991,799 issued to Yen ("Yen"). Claims 12-13 and 42-43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Voyticky and Brodsky, in further view of U.S. Patent No. 5,956,716 issued to Kenner ("Kenner"). Claims 18 and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Voyticky and Brodsky, in further view of U.S. Patent No. 6,637,032 issued to Feinleib ("Feinleib"). Claims 19-20 and 49-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Voyticky and Brodsky, in further view of U.S. Patent No. 6,348,932 issued to Nishikawa ("Nishikawa"). Claims 30 and 60 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Voyticky and Brodsky, in further view

of Kenner and Yen. As set forth below, Applicant respectfully submits that each of the pending claims is patentably distinct from the cited prior art.

Claim 1 has been amended to recite that a user command to find supplemental content is received in response to a user activating a specifically-designated button on a remote control device. None of the cited references, whether considered alone or in combination, teach or suggest this feature.

The Examiner suggests that the "event" button of Voyticky meets this limitation. However, a careful review of Voyticky's discussion of this button reveals that this is not the case. As stated by Voyticky, "Each time the user 101 presses the event button, the remote 105 stores event information." Col. 5, lines 62-63. Thus, pressing the "event button" causes event information (the time at which the button was pressed and/or the channel being watched at that time, for example) to be stored. In order to generate a command to find supplemental content, the user must then take the remote to his home computer, establish a communication session with the computer, transfer the event information to the home computer, use the home computer to establish an Internet connection, and then download the applicable supplemental content. See col. 6, lines 1-16. Only **after** this communication session has been established, **after** the event information has been transferred to the computer, and **after** the computer has established a connection with a server, does the Voyticky system attempt to find supplemental content. See *id.*

The teachings of Voyticky, and in particular the functionality of Voyticky's "event button," are therefore in **direct contradiction** to those of the invention set forth in independent claim 1. Under the teachings of Voyticky, a user who wants to

issue a command to find supplemental content relating to a television program at a particular time must push the event button, walk the remote over to his home computer, transfer the event information to the home computer, and set up a communication session to download the supplemental content. Moreover, Voyticky requires the previous creation of a database of information linking information relating to a television program to particular portions of the program and the timing of those portions, see col. 6, lines 25-31, whereas claim 1 explicitly disclaims "requiring existing contextual information associated with the television program to be specifically programmed to trigger the display of particular supplemental content." Under the teachings of Applicant's claimed invention, by contrast, a user who wants to issue a command to find supplemental content relating to a television program at a particular time simply has to press or otherwise activate a specifically-designated button on a remote control device. Applicant's invention was designed to simplify the process of receiving supplemental content relating to a television program by avoiding laborious steps, such as those required by Voyticky.

Brodsky, while presenting a much simpler methodology for requesting and receiving supplemental content relative to Voyticky, also fails to disclose or suggest the use of a specifically-designated button on a remote control device for issuing a command to find such content. Accordingly, neither Voyticky, nor Brodsky, nor the combination of Voyticky and Brodsky, meet this limitation.

Both of the remaining independent claims likewise contain limitations which are not met by the cited references, alone or in combination. For example, claim 31 recites a "remote control device comprising a specifically-designated button for

requesting supplemental content related to the television program." Again, the "event button" of Voyticky does not request supplemental content. Rather, it merely initiates storage of event information, such as the time that the button was pushed. As discussed above, several additional laborious steps must be taken to actually submit a request for supplemental content. Likewise, claim 61 recites "single-button querying for supplemental content related to a television program" and further recites "detecting a single button press on a remote control indicating a user command to find supplemental content," both of which are aspects of the invention which Voyticky utterly fails to teach, and in fact teaches against.

In view of the foregoing, the applicants respectfully submit that all pending claims are patentably distinct over the cited references, alone or in combination. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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